

## REMARKS

Claims 1, 5-7, 10-11, and 13-23 are pending herein.

I. The obviousness rejections of claims 1, 5-7, 10, 11, and 13-19 based on Fujino (US 7,178,110) in view of Martinez, as noted on page 2 of the Office Action.

The USPTO respectfully rejects claims 1, 5-7, 10, 11 and 13-19 under 35 U.S.C. § 103(a) as being unpatentable over Fujino in view of Martinez. Claims 1, 7, and 19 are independent claims.

A. The cited references do not teach or inputting a first name and a second name with an inputting device and searching the plurality of directory structures based on the first name and the second name inputted by the inputting device, as claimed in claims 1, 7, and 19.

Independent claim 1 claims in relevant part:

“inputting the first name and the second name **with an inputting device**;

searching the plurality of directory structures based on the first name and the second name so as to extract all the prescribed directory structure comprising the directory having the first name and the directory having the second name in the storage medium.” (**emphasis added**)

Independent claims 7 and 19 claim similar limitations. Regarding these limitations, it is respectfully not seen where the cited references teach or suggest the claimed structure quoted above.

For example, the USPTO respectfully argues on pages 3-4 of the Office Action that Fujino and Martinez teach inputting the first name and the second name with an inputting device and searching the plurality of directory structures based on the inputted first name and second name. However, it is respectfully asserted that **Fujino and Martinez only teach that a user can select an existing name from a list of preexisting directory structures, and thus do not teach or suggest that that a user can input a first name and a second name with an inputting device**, as claimed in claims 1, 7, and 19.

Specifically, as seen in Figures 11 and 12 column 7, lines 5-8 of Fujino, a window W' includes a folder tree display window W4. As further explained at column 7, lines 18-32 of

Fujino, a user selects folders or files that are displayed on the screen. It is respectfully important to note that in Fujino, **the user is only selecting pre-existing folders or files that exist in window W', and not using an inputting device to input a first name and a second name**, as claimed in claims 1, 7, and 19. In other words, a user in Fujino cannot input a first name and a second name that is not already displayed on the video display terminal.

Additionally, Martinez respectfully does not overcome these deficiencies in Fujino. For example as seen in column 7, lines 1-15 of Martinez, an operator uses a graphical pointer 40 to select a pre-existing directory tree member. Similar to Fujino, it is respectfully important to note that in Martinez, **the user is only selecting from among pre-existing directory tree members, and the user is respectfully not using an inputting device to input a first name and a second name**, as claimed in claims 1, 7, and 19. In other words, a user in Martinez cannot input a first name and a second name that is not already displayed on the video display terminal.

It is respectfully noted that Martinez mentions a keyboard at column 7, lines 16-17. However **this keyboard of Martinez is not an inputting device used to input a first and second name**, as claimed in claims 1, 7, and 19. Instead, the keyboard is respectfully only used as a “secondary selection switch” (i.e., like right mouse button 47 seen in Figure 2 of Martinez).

In contrast, present Figures 1 and 2 illustrate one possible embodiment of the claimed structure quoted above. For example, as explained on page 16 of the present specification, **a user can use an inputting device (such as keyboard 6) to input names such as “ImageDir” and “IMGD1.”** As further explained on pages 16-17 of the present specification, the plurality of directory structures are searched based on the first and second name inputted by the inputting device, as claimed in claims 1, 7, and 19.

The specifically claimed methods and apparatus of claims 1, 7, and 19 is important and non-trivial because it results in significant advantages over conventional methods and apparatuses. For example, in the methods and apparatus of claim 1, 7, and 19, **an operator or user can input a name that does not exist in the storage medium as the first name and the second name.** In contrast, in Fujino and Martinez, because the first name and the second

name are only selected from the directory tree structure, the user is only selecting from preexisting names. Thus, a user in Fujino and Martinez would not be able to enter a first name and a second name that is not shown on the display terminal or that does not already exist in the storage medium.

B. Further explanation.

Applicants respectfully note that the following further explanation regarding claims 1, 7, and 19.

Applicants are respectfully aware that page 16, lines 17-19 of the present specification state “They can be entered by the user using the keyboard 6, clicking of the mouse or the like or selecting from a plurality of names determined by default in advance.” It is respectfully important to note that the phrase “the plurality of names determined by default in advance” does not mean that the plurality of names exist in the directory structure in the storage medium. In contrast, it is possible to determined a plurality of names in advance that are not listed in the directory structure in the storage medium.

C. The dependent claims.

As noted above, it is respectfully asserted that independent claims 1 and 7 are allowable, and therefore it is further respectfully asserted that dependent claims 5-6, 10, 11 and 13-18 are also allowable.

II. The new claims.

Applicants respectfully note that new claims 20-23 have been added. No new matter is added by the amendments. Support for the amendments is found at page 16, second paragraph of the present specification.

Applicants respectfully assert that dependent claims 20-23 are allowable because the cited references only respectfully teach selecting a name from a preexisting list of directory structures such as by using a mouse, for example, and respectfully do not teach or suggest that

the inputting device is “a keyboard” or “a character input device,” as claimed in new claims 20-23.

### III. Conclusion.

Reconsideration and allowance of all of the claims is respectfully requested.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130.

Please contact the undersigned for any reason. Applicants seek to cooperate with the Examiner including via telephone if convenient for the Examiner.

Respectfully submitted,

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